AO 91 (Rev. 5/95) Criminal Complaint

UNITED STATES DISTRICT COUR is a States District Court Court

SOUTHERN DISTRICT OF TEXAS

BROWNSVILLE DIVISION

AUG 2 4 2014

UNITED STATES OF AMERICA

David J. Bradley, Clerk of Court

VS

CRIMINAL COMPLAINT

PLACENCIA-Vela, Julia V. A202 008 904

CASE NUMBER: B:14

I, the undersigned being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 22, 2014 in Cameron County, in the SOUTHERN District of TEXAS, defendant,

knowingly, willfully, and in violation of law did bring or attempt to bring into the United States one undocumented minor alien knowing or in reckless disregard of the fact that such alien has not received prior authorization to come to, enter, or reside in the United States, and done for the purpose of commercial advantage or private financial gain,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iv) in violation of Title 8 United States Code, Section(s) 1324(a)(2)(B)(ii)

I further state that I am a (n) <u>Customs and Border Protection Officer</u> and that this complaint is based on the following facts:

The defendant attempted to bring into the United States one undocumented minor alien, 12 years of age, through the pedestrian primary lanes at the Gateway International Bridge in Brownsville, TX. Upon inspection, the defendant claimed the minor child as her son and presented a City of Weslaco issued birth certificate bearing the name of Dominik Rodriguez on his behalf to a Customs and Border Protection Officer. After further inspection, Customs and Border Protection Officers determined that the minor child is not a United States citizen, is not related to the defendant, and has no legal status to come to, enter, or reside in the United States. After further interview, the defendant admitted that the minor alien is not her child and that she had full knowledge of the fact that the minor alien has no legal documents to enter the United States. The defendant further admitted that she was going to receive \$500.00 USD for crossing the minor alien from Matamoros, Tamaulipas to Brownsville, TX.

Continued on the attached sheet ar	and made a	part	hereof:
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Signature of Complainant Armando Espinozá Jr.

Sworn to before me and subscribed in my presence,

<u>August 24, 2014</u> Date

BROWNSVILLE, /Texas

City and State

Ronald G. Morgan U.S. MAGISTRATE JUDGE Name & Title of Judicial Officer

al Officer